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**From:** Pretreatment@groups.io [Pretreatment@groups.io]  
on behalf of Miguel Rodas [miguel.rodas@lacity.org]  
**Sent:** 1/7/2022 7:31:44 PM  
**To:** Pretreatment@groups.io  
**Subject:** Re: [Pretreatment] Permitting of Non-Discharging CIUs

When stated “CIUs not discharging for the last 5 plus years” I assume two things: 1) that there is a connection to the City sewer line, and that the only discharge-so far- is domestic wastestream. 2) For whatever reasons, this CIU is not currently discharging.

In City of LA (where I am), an industrial wastewater permit is granted for being “connected” to discharge industrial wastewaters (eventually). If this CIU have not discharged in last 5 years plus, that is their problem. Just the fact of being connected to the sewer line is a privilege; the potential to discharge remains as long as that point of discharge is “open”. In general terms and without going through all specifics, a permit cannot be cancelled just because this CIU is not currently discharging. I have seen IUs not discharging (initially) until 3 plus years until they put all the necessary infrastructure that eventually will generate either regulated or not regulated wastestream. In my opinion, there is no need to consult with the control authorize for this issue. Furthermore, An IU becomes a zero discharger only until there is no connection to the sewer line. I hope this help.

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